

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JULIA RELLOU, :
: Plaintiff, : 07 Civ. 1334 (KMK)
: :
: - against - : ECF Case
: :
JP MORGAN CHASE LONG-TERM DISABILITY :
PLAN, DIRECTOR OF HUMAN RESOURCES, JP :
MORGAN CHASE & CO., as Plan Administrator and :
Fiduciary and FIRST UNUM, as Fiduciary, :
: Defendants. :
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NOTICE OF MOTION FOR SUMMARY JUDGMENT

PLEASE TAKE NOTICE that, upon the Declaration of Patrick W. Begos, the Administrative Record, and all prior papers and proceedings in this action, defendant, First Unum Life Insurance Company (“First Unum”), will move this Court before the Honorable Kenneth M. Karas, at the Courthouse, 300 Quarropas Street, White Plains, New York, on such date and at such time as the Court may direct, for an order confirming First Unum’s administrative determination, dismissing plaintiff’s action as against First Unum, awarding First Unum its attorneys’ fees in this action, and awarding such other relief as the Court deems just.

Dated: Bronxville, New York
September 18, 2008

BEGOS HORGAN & BROWN LLP

By: _____
Patrick W. Begos (PB 4372)
Attorneys for First Unum Life Ins. Co.
7 Pondfield Road
Bronxville, NY 10708
(914) 961-4441

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Defendants. :
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ADMINISTRATIVE RECORD

Part 1 of 2

FULCL00001 through FULCL00459

**FILED IN HARD COPY PURSUANT TO SECTION 5.3 OF THE COURT'S
ECF RULES AND INSTRUCTIONS**

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ADMINISTRATIVE RECORD

Part 2 of 2

FULCL00460 through FULCL00907

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